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October 24, 2023

**VIA ECF**

Hon. Jennifer H. Rearden  
U.S. District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *Ulku Rowe v. Google LLC*, Case No. 1:19-cv-08655-LGS

Dear Judge Rearden:

We represent Defendant Google LLC (“Google”) in this matter. We write jointly with Plaintiff to respectfully request a briefing schedule as laid out below for the parties’ anticipated post-trial motions.

Defendant intends to renew its motion for judgment as a matter of law pursuant to Fed. R. Civ. P. 50(b) and seek remittitur of the punitive damages award pursuant to Fed. R. Civ. P. 59(e), and reserves the right to apply for other relief available under the Federal Rules of Civil Procedure. Plaintiff intends to seek statutory attorneys’ fees as the prevailing party, and declaratory judgment/injunctive relief related to the verdict, including reinstatement of Ms. Rowe to position(s) Google denied her and releveling Ms. Rowe to Level 9. Plaintiff reserves the right to apply for other relief available under the Federal Rules of Civil Procedure. The parties have met and conferred on a briefing schedule, and propose the following deadlines:

- November 22, 2023 – anticipated motions and supporting briefs due
- December 13, 2023 – opposition briefs due
- December 20, 2023 – reply briefs due

We thank the Court for its consideration.

Respectfully submitted,



Kenneth W. Gage  
PAUL HASTINGS LLP